

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JOSEPH S. GELMIS, Individually And  
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

EARL W. COLE, III, et al.,

Defendants.

CASE NO. 08-CV-00980 (RMB)

JULES ROTHAS, Individually And  
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

MUNICIPAL MORTGAGE & EQUITY,  
LLC, et al.,

Defendants.

CASE NO. 08-CV-01120 (RMB)

ARNOLD J. ROSS, Individually And  
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

EARL W. COLE, III, et al.,

Defendants.

CASE NO. 08-CV-01299 (RMB)

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ALEX D'ANGELO, Individually And  
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

MUNICIPAL MORTGAGE & EQUITY,  
LLC, et al.,

Defendants.

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CASE NO. 08-CV-01331 (RMB)

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JUDITH GREENBERG, Individually And  
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

MICHAEL L. FALCONE, et al.,

Defendants.

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CASE NO. 08-CV-02005 (MGC)

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NAOMI RAPAHIEL, Individually And  
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

MUNICIPAL MORTGAGE & EQUITY,  
LLC, et al.,

Defendants.

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CASE NO. 08-CV-02190 (RMB)

**PLEASE TAKE NOTICE** that the Kremser Group (or “Movant”) respectfully moves this Court for an order: (1) consolidating, pursuant to Fed. R. Civ. P. 42, all related actions; (2) appointing the Kremser Group as Lead Plaintiff in the consolidated action (the “Action”)

pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(B), and Section 27(a)(3)(B) of the Securities Act of 1933 (“Securities Act”), 15 U.S.C. § 77z-1(a)(3)(B) as amended by Section 101(a) of the Private Securities Litigation Reform Act of 1995 (“PLSRA”); and (3) approving its selection of the law firms of Kahn Gauthier Swick, LLC (“KGS”) and Brower Piven, A Professional Corporation (“BP”), as Co-Lead Counsel for the Class.

The Kremser Group makes this motion on the belief that it is the most “adequate plaintiff” as defined in the PSLRA because: (1) its members have the largest financial interest in the relief sought by the Class and have incurred substantial losses in the amount of \$924,138.87 as a result of their purchases of Municipal Mortgage & Equity, LLC stock during the Class Period; and (2) its members satisfy the typicality and adequacy requirements of Fed. R. Civ. P. Rule 23.

The Kremser Group further requests that the Court approve its selection of its counsel, KGS and BP, as Co-Lead Counsel for the Class. These firms have actively investigated the allegations raised against Defendants. KGS and BP are nationally-recognized law firms with significant experience prosecuting federal securities law class actions, and are firms with the resources to effectively and properly pursue this action.

For all of the reasons set forth herein and in the accompanying Memorandum of Law and the Declaration of David A.P. Brower in Support of the Motion of The Kremser Group to Consolidate All Related Actions, To Be Appointed Lead Plaintiff, and To Approve Proposed Lead Plaintiff’s Choice of Counsel submitted herewith, the Kremser Group respectfully requests that this Court: (1) consolidate all related actions with the instant case; (2) appoint the Kremser

Group as Lead Plaintiff pursuant to the PSLRA; (3) approve the Kremser Group's selection of Co-Lead Counsel for the Class; and (4) grant such other and further relief as the Court may deem just and proper.

Dated: March 31, 2008

Respectfully submitted,

BROWER PIVEN  
A Professional Corporation

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-AND-

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*Counsel for the Kremser Group and  
Proposed Lead Counsel for the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that this Notice of Motion was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on March 31, 2008.

/s/ David A.P. Brower  
David A.P. Brower